UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and MANULIFE INSURANCE COMPANY (f/k/a INVESTORS PARTNER LIFE INSURANCE COMPANY),	)	Civil Action No. 05-11150-DPW
Plaintiffs,	)	
v.	)	
ABBOTT LABORATORIES,	)	
Defendant.	)	

AFFIDAVIT OF OZGE GUZELSU IN SUPPORT OF MOTION FOR PROTECTIVE ORDER REGARDING DEPOSITION TOPICS 1 AND 2 OF HANCOCK'S RULE 30(b)(6) DEPOSITION NOTICE

I, Ozge Guzelsu, hereby state that:

1. I currently am employed as an associate at Munger, Tolles & Olson LLP. I submit this declaration in support of Defendant Abbott Laboratories' ("Abbott's") Motion for Protective Order Regarding Deposition Topics 1 and 2 of Hancock's Rule 30(b)(6) Deposition Notice. If called as a witness, I could and would testify competently to the facts stated herein.

2. Attached hereto as Exhibit A are true and correct copies of .excerpts from the deposition of Dr. Bruce McCarthy taken September 29, 2006.

3. Attached hereto as Exhibit B are true and correct copies of excerpts of the deposition of Dr. Bruce McCarthy taken March 16, 2007.

4. Attached hereto as Exhibit C are true and correct copies of excerpts of the deposition of Dr. Christopher Silber taken February 9, 2007.

5. Attached hereto as Exhibit D are true and correct copies of excerpts of the deposition of Marilyn Collicott taken September 27, 2006.

6. Attached hereto as Exhibit E are true and correct copies of excerpts of the deposition of James Thomas taken April 13, 2007.

7. Attached hereto as Exhibit F are true and correct copies of excerpts of the deposition of Michael Meyer taken January 23, 2007.

8. Attached hereto as Exhibit G are true and correct copies of excerpts of the deposition of Andrea Landsberg taken February 16, 2007.

9. Attached hereto as Exhibit H are true and correct copies of excerpts of the deposition of Dr. Paul Andrews taken April 4, 2007.

10. Attached hereto as Exhibit I are true and correct copies of excerpts of the deposition of Dr. Perry Nisen taken November 22, 2006.

11. Attached hereto as Exhibit J are true and correct copies of excerpts of the deposition of Dr. Azmi Nabulsi taken January 24, 2007.

12. Attached hereto as Exhibit K are true and correct copies of excerpts of the deposition of Diane D'Amico taken October 26, 2006.

13. Attached hereto as Exhibit L are true and correct copies of excerpts of the deposition of Diane D'Amico taken November 28, 2006.

14. Attached hereto as Exhibit M are true and correct copies of excerpts of the

deposition of Jim Looman taken February 1, 2007.

15. Attached hereto as Exhibit N are true and correct copies of excerpts of the deposition of Elizabeth Kowaluk taken October 10, 2006.

16. Attached hereto as Exhibit O are true and correct copies of excerpts of the deposition of Lise Loberg taken February 2, 2007.

17. Attached hereto as Exhibit P are true and correct copies of excerpts of the deposition John Leonard taken November 30, 2006.

18. Attached hereto as Exhibit Q are true and correct copies of excerpts of the deposition of Jeffrey Leiden taken April 26, 2007.

19. Attached hereto as Exhibit R are true and correct copies of excerpts of the deposition of Philip Deemer taken October 27, 2006.

20. Attached hereto as Exhibit S is a true and correct copy of Hancock's Revised Notice of Deposition pursuant to Rule 30(b)(6), dated March 26, 2007.

21. Attached hereto as Exhibit T is a true and correct copy of Hancock's Notice of Deposition pursuant to Rule 30(b)(6), dated March 30, 2007.

22. Attached hereto as Exhibit U are true and correct copies of excerpts of the deposition of Keith Hendricks taken April 27, 2007.

23. Attached hereto as Exhibit V is a true and correct copy of a letter from Jeffrey Weinberger, Esq. to Brian Davis, Esq., dated April 13, 2007.

24. Attached hereto as Exhibit W is a true and correct copy of a letter from Joseph Zwicker, Esq. to Jeffrey Weinberger, Esq. dated April 18, 2007.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this affidavit is executed this 7th day of May, 2007, in Los Angeles, California.

Ozge Guzelsu

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 7, 2007.

Date: May 7, 2007.

/s/ Michael S. D'Orsi
Michael S. D'Orsi

Exhibit A,
Filed Under Seal

Exhibit B,
Filed Under Seal

Exhibit C,
Filed Under Seal

Exhibit D,
Filed Under Seal

Exhibit E,
Filed Under Seal

Exhibit F,
Filed Under Seal

Exhibit G,
Filed Under Seal

Exhibit H,
Filed Under Seal

Exhibit I,
Filed Under Seal

Exhibit J,
Filed Under Seal

Exhibit K,
Filed Under Seal

Exhibit L,
Filed Under Seal

Exhibit M,
Filed Under Seal

Exhibit N,
Filed Under Seal

Exhibit O,
Filed Under Seal

Exhibit P,
Filed Under Seal

Exhibit Q,
Filed Under Seal

Exhibit R,
Filed Under Seal

EXHIBIT S

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and MANULIFE INSURANCE COMPANY (f/k/a INVESTORS PARTNER INSURANCE COMPANY), Plaintiffs, v. ABBOTT LABORATORIES, Defendant.	CIVIL ACTION NO. 05-11150-DPW

REVISED NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a Investors Partner Insurance Company) (collectively, "John Hancock") will take the deposition of defendant Abbott Laboratories on Friday, April 27, 2007, commencing at 9:30 a.m. at the offices of Levenfeld Pearlstein, LLC, 2 North LaSalle Street, Suite 1300, Chicago, Illinois, or such other location as may be mutually agreed to by the parties. Abbott shall designate, prepare and produce one or more knowledgeable officers, directors, or other representatives to testify on its behalf as to the topics set forth below.

PLEASE TAKE FURTHER NOTICE that the deposition noticed above will be recorded stenographically, and through real-time court reporting, such as by LiveNote. The deposition also may be recorded by audio or video technology, such as videotape. The deposition will be taken before a notary public or other person authorized to administer oaths and will continue from day-to-day until completed, Saturdays, Sundays and holiday excepted.

Definitions

For purposes of this Notice, John Hancock adopts the "Uniform Definitions in Discovery Requests" contained in Local Rule 26.5. The following additional terms shall have the meanings set forth below:

1. "You," "your" and "Abbott" shall mean defendant Abbott Laboratories, its various corporate parents, subsidiaries, affiliates, subdivisions and departments, and any and all representatives, successors, assigns, officers, directors, employees, agents, attorneys or other persons or entities who have acted or purported to act for or on behalf of any of them.

2. "John Hancock" shall mean collectively defendants John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a Investors Partner Life Insurance Company), their various subsidiaries, affiliates, divisions and departments, and any and all representatives, successors, assigns, officers, directors, employees, agents, auditors, attorneys or other persons or entities who have acted or purported to act for or on behalf of any of them, including, without limitation, representatives of the StoneTurn Group.

3. The "Research Funding Agreement" shall mean the Research Funding Agreement by and between Abbott and John Hancock, dated as of March 13, 2001.

4. The "Program Compounds" shall have the meaning set forth in the Research Funding Agreement.

5. "Regarding" shall have the same meaning as "concerning."

6. "Any" also shall mean "all," and "all" also shall mean "any."

Topics Of Examination

1. Abbott's usual policies, practices, procedures and methodologies, as of 2000 and 2001, for projecting future sales and revenues for the Program Compounds or other pharmaceutical compounds under development by Abbott, including, but not limited to:

a. how Abbott considered or analyzed market opportunities for such compounds;

b. how Abbott considered or analyzed actual or potential competing products for such compounds;

c. any market data or other information considered by Abbott in projecting sales and revenues for such compounds;

d. how Abbott considered or analyzed the likelihood of regulatory success for such compounds;

e. how Abbott considered or analyzed commercialization costs, such as manufacturing and marketing costs, for such compounds;

f. how Abbott considered or analyzed potential profits for such compounds;

g. the identity and responsibilities of the persons who had primary responsibility within Abbott for projecting future sales and revenues for such compounds; and

h. any other factor that Abbott considered or analyzed in projecting future sales and revenues for such compounds.

2. The specific policies, practices, procedures and methodologies utilized by Abbott to project future sales and revenues for the Program Compound known as ABT-518 in 2000 and 2001, including, but not limited to, the policies, practices, procedures and methodologies utilized by Abbott to prepare the sales projections set forth in the documents attached hereto as Exhibit A.

3. The specific policies, practices, procedures and methodologies utilized by Abbott to project future sales and revenues for the Program Compound known as ABT-594 in 2000 and 2001, including, but not limited to, the policies, practices, procedures and methodologies utilized by Abbott to prepare the sales projections set forth in the documents attached hereto as Exhibit B.

4. The specific policies, practices, procedures and methodologies utilized by Abbott to project future sales and revenues for the Program Compound known as ABT-773 in 2000 and 2001, including, but not limited to, the policies, practices, procedures and methodologies utilized by Abbott to prepare the sales projections set forth in the documents attached hereto as Exhibit C.

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and MANULIFE INSURANCE COMPANY (f/k/a INVESTORS PARTNER INSURANCE COMPANY)

By its attorneys,

Brian A. Davis (BBO No. 546462)
Joseph H. Zwicker (BBO No. 560219)
Karen Collari Troake (BBO No. 566922)
Richard C. Abati (BBO No. 651037)
Stacy Blasberg (BBO No. 657420)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
Tele: (617) 248-5000
Fax: (617) 248-4000

Date: March 26, 2007

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by electronic and overnight mail upon Peter E. Gelhaar, Esq., Donnelly, Conroy & Gelhaar, LLP, One Beacon Street, 33rd Floor, Boston, MA 02108, and Gregory D. Phillips, Esq., Munger, Tolles & Olson LLP, 355 South Grand Avenue, Los Angeles, CA 90071, on this 26th day of March, 2007.

Richard C. Abati

EXHIBIT A

ABT- 518	Total ~ Base

Project Information

Franchise Name: Oncology
Program Name: ABT-518 (MMPI)
Abbreviated Program Name: ABT-518
Project Title: MMPI
Abbreviated Project Title: MMPI
ABT#: ABT-518
Patent Expiration: 0
Current Phase: I
Project Type: Development
Project Goal: Indication

Development Timeline

Milestone	Quarter	Year	Funding
Pre-Clin	1	2000	---
Ph I	1	2001	28
Ph II	3	2002	49
Ph III	4	2003	64
Filing pNDA/NDA Submission	4	2005	---
Launch	2	2006	

Contact Information:

Domestic Contact:	Lori Taylor/Lisa Lux
International Contact:	Anil Nambeedipad
R&D Contact:	Anita Baldor

Base Sales	Year 0 2000	Year 1 2001	Year 2 2002	Year 3 2003	Year 4 2004	Year 5 2005	Year 6 2006	Year 7 2007	Year 8 2008	Year 9 2009	Year 10 2010	Year 11 2011	Year 12 2012	Year 13 2013	Year 14 2014	Year 15 2015	Year 16 2016	Nominal Total
Domestic Sales	---	---	---	---	---	---	22	68	99	151	177	226	252	275	299	307	---	1,864
International Sales	---	---	---	---	---	---	---	9	17	59	97	155	173	193	190	189	191	1,273
Net Sales	---	---	---	---	---	---	22	67	116	210	274	382	425	468	488	496	191	3,137
Less: Cost of Sales	---	---	---	---	---	---	2	7	12	21	28	39	43	47	49	50	19	318
Standard Margin	---	---	---	---	---	---	19	60	104	189	246	344	382	421	437	446	172	2,820
Less: Other Mfg Costs, Net	---	---	---	---	---	---	---	0	0	1	1	2	2	2	2	2	2	13
Subtotal, Manufacturing Margin	---	---	---	---	---	---	19	60	104	188	245	342	381	419	435	444	170	2,807
Mfg. Management Exp.	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Project Expense	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Royalties, Net	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Freight	---	---	---	---	---	---	0	2	3	6	8	10	11	11	11	10	7	78
Dist. & Public Warehouse	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Subtotal, Other Cost of Goods Sold	---	---	---	---	---	---	0	2	3	6	8	10	11	11	11	10	7	78
Distribution Margin	---	---	---	---	---	---	19	58	101	182	236	332	370	408	424	433	163	2,729
Research & Development	---	9	36	36	29	23	13	24	26	21	2	2	2	2	2	2	2	234
Research & Dev. Milestones	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Subtotal, R & D	---	9	36	36	29	23	13	24	26	21	2	2	2	2	2	2	2	234
Medical	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SG&A (Mkt, Salesforce, Admin)	---	---	---	---	---	3	24	47	44	35	35	30	28	21	16	10	7	304
Division Margin	---	(9)	(36)	(36)	(29)	(26)	(18)	(13)	31	127	202	300	340	385	406	419	155	2,191
Taxes	---	---	---	---	---	(1)	(1)	7	23	43	53	72	82	92	101	105	---	577
Net Income	---	(9)	(36)	(36)	(29)	(25)	(17)	(20)	8	84	149	227	258	293	304	314	155	1,614

Pre-Clinical	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	23
Phase I	---	9	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	48
Phase II	---	---	16	27	---	---	---	---	---	---	---	---	---	---	---	---	---	64
Phase III	---	---	---	9	29	23	3	---	---	---	---	---	---	---	---	---	---	35
Phase IV	---	---	---	---	---	---	10	24	26	21	2	2	2	2	2	2	2	224
Total R&D	---	9	26	36	29	23	13	24	26	21	2	2	2	2	2	2	2	234
		okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	

Discount Rate	12.5%	
Division Margin Analysis	NPV=	455 (15 year analysis)
	IRR=	35% (15 year analysis)
R&D to Launch		138 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		0.10 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		22 (2000-2005 Revenue)
Long-Term Division Margin		647 (2007-2011 Division Margin)
Peak Year Margin		415
Expected Value (EV)		14 (15 year analysis)
R&D Cost NPV		138 (15 year analysis)
Project Expected NPV		24
Probabilistic Pest Index		0.40

Success Probabilities

	Preclin	Ph I	Ph II	Ph III*	Launch
Abbott (history)	68%	57%	58%	67%	15%
Lehman/Zeneca	40%	70%	50%	60%	8%
CMRI	50%	75%	51%	65%	12%
A. Little (L)	6%	15%	20%	50%	0%
A. Little (M)	31%	39%	50%	74%	4%
A. Little (H)	50%	77%	67%	100%	26%
ABT Proj. - Base	100%	50%	50%	50%	13%
ABT Proj. - Upside	100%	50%	50%	50%	13%
ABT Proj. - Low	100%	50%	50%	50%	13%

* Includes registration

HIGHLY CONFIDENTIAL

ABBT 0003362

ABT- 518	Total – Upside

	LRP																
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
%	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales	--	--	--	--	--	--	29	79	135	312	411	486	563	623	677	709	--	4,026
International Sales	--	--	--	--	--	--	--	14	28	98	162	269	284	323	318	315	319	2,123
Net Sales	--	--	--	--	--	--	29	93	163	410	573	755	847	946	994	1,024	319	6,150
Less: Costs of Sales	--	--	--	--	--	--	3	9	9	17	29	39	48	48	50	52	16	312
Standard Margin	--	--	--	--	--	--	26	89	154	393	544	717	800	898	944	969	303	5,840
Less: Other Mfg Costs, Net	--	--	--	--	--	--	--	0	0	1	2	3	3	3	3	3	3	21
Subtotal, Manufacturing Margin	--	--	--	--	--	--	26	88	154	388	542	714	806	895	941	969	300	5,819
Mfg. Management Exp	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Freight	--	--	--	--	--	--	0	2	3	7	10	13	14	14	15	14	7	100
Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, Other Costs of Goods Sold	--	--	--	--	--	--	0	2	3	7	10	13	14	14	15	14	7	100
Distribution Margin	--	--	--	--	--	--	26	86	151	381	532	701	792	880	926	949	293	5,719
Research & Development	--	9	38	38	29	23	13	24	28	21	2	2	2	2	2	2	2	234
Research & Dev. Milestone	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, R&D	--	9	38	38	29	23	13	24	28	21	2	2	2	2	2	2	2	234
Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SG&A (Mkt, Salesforce, Admin)	--	3	3	3	3	3	39	56	51	45	44	39	35	35	17	17	7	386
Division Margin	--	(9)	(38)	(38)	(29)	(26)	(26)	7	74	315	488	660	756	853	907	930	284	5,117
Taxes	--	(0)	(1)	(1)	(1)	(1)	(0)	1	3	13	20	27	31	35	37	38	12	215
Net Income	--	(9)	(36)	(36)	(28)	(25)	(26)	6	71	302	468	633	725	818	870	892	272	4,902

Discount Rate	12.5%	
Division Margin Analysis	NPV	1,203 (15 year analysis)
	IRR	46% (15 year analysis)
R&D to Launch		138 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		0.73 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		29 (2003-2006 Revenue)
Long-Term Division Margin		1,842 (2007-2011 Division Margin)
Peak Year Margin		930
Expected Value (EV)		168 (15 year analysis)
R&D Cost NPV		148 (15 year analysis)
50th Percentile		49

HIGHLY CONFIDENTIAL

ABBT 0003363

ABT- 518	Total ~ Low

%		LRP																	
		Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
	Domestic Sales	--	--	--	--	--	--	4	11	19	28	33	43	47	52	55	57	--	350
	International Sales	--	--	--	--	--	--	--	--	5	19	43	127	137	183	391	149	151	993
	Net Sales	--	--	--	--	--	--	4	16	29	71	107	184	184	255	208	207	151	1,343
0%	Less: Cost of Sales	--	--	--	--	--	--	1	3	5	12	16	27	30	34	34	34	23	220
	Standard Margin	--	--	--	--	--	--	3	13	23	59	91	157	154	171	172	173	129	1,123
0%	Less: Other Mfg Costs, Net	--	--	--	--	--	--	--	0	0	0	1	1	1	2	2	1	2	10
	Subtotal, Manufacturing Margin	--	--	--	--	--	--	3	13	23	58	88	156	152	170	171	171	127	1,113
	Mfg Management Exp.	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Freight	--	--	--	--	--	--	0	0	1	2	3	5	5	6	6	6	5	38
	Dist. & Pubs Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, Other Costs of Goods Sold	--	--	--	--	--	--	0	0	1	2	3	5	5	6	6	6	5	38
	Distribution Margin	--	--	--	--	--	--	3	13	23	57	86	151	147	164	165	165	122	1,074
	Research & Development	--	9	39	39	28	23	13	24	26	21	2	2	2	2	2	2	2	234
	Research & Dev. Milestones	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, R&D	--	9	39	39	28	23	13	24	26	21	2	2	2	2	2	2	2	234
0%	Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	SG&A (Mkt, Salesforce, Admin)	--	--	--	--	--	3	10	26	27	23	22	21	20	14	11	11	7	196
	Division Margin	--	(9)	(26)	(35)	(29)	(26)	(20)	(36)	(31)	13	61	109	125	148	152	152	113	645
0%	Taxes	--	--	--	--	--	(3)	(2)	(3)	0	4	5	8	11	13	15	16	--	68
	Net Income	--	(9)	(26)	(35)	(29)	(23)	(18)	(33)	(31)	10	56	100	115	135	138	136	113	577

Discount Rate	12.5%	
Division Margin Analysis	NPV	40 (15 year analysis)
	IRR	16% (15 year analysis)
R&D to Launch		138 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		1.25 (ENPV of Dist for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		4 (2005-2006 Revenues)
Long-Term Division Margin		113 (2007-2011 Division Margin)
Peak Year Margin		152
Expected Value (EV)		436 (15 year analysis)
R&D Cost NPV		145 (15 year analysis)
10th Percentile		(26)

HIGHLY CONFIDENTIAL

ABBT 0003364

EXHIBIT B

ABT- 594	Total – Base

Project Information

Franchise Name: Analgesia
Program Name: ABT-594
Abbreviated Program Name: ABT-594
Project Title: Chronic Persistent Pain
Abbreviated Project Title: CPP
ABT#: ABT-594
Patent Expiration: 2016
Current Phase: II
Project Type: Development
Project Goal: Indication

Development Timeline

Initiate:	Quarter	Year	Funding
Pre-Clin	1	1997	---
Ph I	3	1997	---
Ph II	3	1999	8
Ph III	0	0	---
Filing (NDA/BLA/MAA Submission)	3	2003	---
Launch	3	2004	

Contact Information:

PPD Commercial Contact:	Andrea Landsberg
Ab Commercial Contact:	Laura Robbins
R&D Contact:	Barbara Mass

Base Sales	Year 0 2000	Year 1 2001	Year 2 2002	Year 3 2003	Year 4 2004	Year 5 2005	Year 6 2006	Year 7 2007	Year 8 2008	Year 9 2009	Year 10 2010	Year 11 2011	Year 12 2012	Year 13 2013	Year 14 2014	Year 15 2015	Year 16 2016	Nominal Total
Domestic Sales					12	21	35	54	79	95	93	80	72	69	67	62	45	793
International Sales					1	15	35	57	80	105	113	117	117	115	113	107	88	1,061
Net Sales					13	36	70	111	159	200	206	197	189	184	180	169	131	1,854
Less: Cost of Sales					1	4	8	13	19	22	26	24	24	23	23	21	17	224
Standard Margin					12	32	62	98	140	178	181	173	165	161	157	148	114	1,630
Less: Other Mfg Costs, Net					0	0	0	1	1	1	1	1	1	1	1	1	1	11
Subtotal, Manufacturing Margin					12	32	62	98	140	176	180	171	164	160	156	147	113	1,609
Mfg Management Exp																		
Project Expense																		
Royalties, Net																		
Freight					0	0	0	1	1	1	1	1	1	1				6
Dist. & Public Warehouse																		
Subtotal, Other Cost of Goods Sold					0	0	0	1	1	1	1	1	1	1				6
Distribution Margin					12	32	62	97	139	174	179	171	163	159	156	147	113	1,603
Research & Development		3	2															5
Research & Dev. Milestones																		
Subtotal, R & D		3	2															5
Medical																		
SG&A (Mkt, Sales/Prom, Admin)					7	17	23	33	41	51	7	7	8	8	8	8	8	166
Division Margin		(3)	(2)		5	15	40	65	98	123	172	164	157	153	150	142	109	1,448
Taxes		(1)	(1)		2	6	16	26	39	49	69	66	63	61	60	57	44	579
Net Income		(2)	(2)		4	10	24	39	59	74	103	98	94	92	90	85	65	869

Pre-Clinical																		
Phase I																		5
Phase II		3	2															
Phase III																		
Phase IV																		5
Total R&D		3	2															
		okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay

Discount Rate	12.5%	
Division Margin Analysis	NPV=	447 (15 year analysis)
	IRR=	117% (15 year analysis)
R&D to Launch		5 (Total of all Pre-Clin, Ph I, Ph II, Ph III costs)
Productivity Index		5.70 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		120 (2003-2006 Revenue)
Long-Term Division Margin		714 (2007-2015 Division Margin)
Peak Year Margin		172
Expected Value (EV)		29 (15 year analysis)
R&D Cost NPV		5 (15 year analysis)
Project Expected NPV		34
Probabilistic Prod Index		6.75

Success Probabilities

	Preclin	Ph I	Ph II	Ph III*	Launch
Abbott (History)	68%	57%	56%	67%	15%
Lehman/Zeneca	40%	70%	50%	60%	8%
CMR2	50%	75%	51%	65%	12%
A. Little (L)	5%	15%	20%	50%	0%
A. Little (M)	31%	38%	50%	74%	4%
A. Little (H)	50%	77%	67%	100%	26%
ABT Proj. - Base	100%	100%	50%	15%	8%
ABT Proj. - Upside	100%	100%	50%	15%	8%
ABT Proj. - Low	100%	100%	50%	15%	8%

* Includes registration

HIGHLY CONFIDENTIAL

ABBT 0003365

ABT- 594	Total – Upside

	LRP																
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
%	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales	-	-	-	-	29	54	81	120	175	194	178	163	146	139	132	124	115	1,650
International Sales					8	40	94	131	213	279	302	316	312	307	301	286	229	2,826
Net Sales					37	94	175	250	388	473	481	479	458	446	433	410	344	4,476
Less: Costs of Sales					7	11	17	27	37	47	48	62	48	46	45	43	38	453
Standard Margin					30	83	158	223	350	426	432	427	410	399	388	367	306	4,023
Less: Other Mfg Costs, Net					0	0	1	2	3	3	5	3	3	3	3	3	2	28
Subtotal, Manufacturing Margin					30	83	157	222	346	422	428	424	407	396	385	364	307	4,007
Mfg. Management Exp.																		
Project Expense																		
Royalties, Net																		
Freight					6	1	1	1	2	2	2	2	1	1				18
Dist. & Public Warehouse																		
Subtotal, Other Costs of Goods Sold					6	1	1	1	2	2	2	2	1	1				18
Distribution Margin					30	84	156	221	347	421	427	422	406	395	385	364	307	3,984
Research & Development		3	2															5
Research & Dev. Milestones																		
Subtotal, R&D		3	2															5
Medical																		
SG&A (Mkt, Salesforce, Admin)					7	17	18	11	11	11	7	7	6	6	6	6	5	114
Division Margin		(3)	(2)		23	67	140	210	336	410	421	415	400	389	379	358	303	3,873
Taxes		(1)	(1)		9	27	56	84	134	164	168	166	160	156	152	143	121	1,549
Net Income		(2)	(2)		15	41	84	126	202	246	253	249	240	233	227	215	182	2,324

Discount Rate	12.5%	
Division Margin Analysis	NPV	1,185 (15 year analysis)
	IRR	179% (15 year analysis)
R&D to Launch		$ (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		16.62 (ENPV of CM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		35% (2003-2006 Revenues)
Long-Term Division Margin		1.62% (2007-2011 Division Margin)
Peak Year Margin		42%
Expected Value (EV)		84 (15 year analysis)
R&D Cost NPV		5 (15 year analysis)
80th Percentile		(5)

HIGHLY CONFIDENTIAL

ABBT 0003366

ABT- 594	Total – Low

%		Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
	Domestic Sales	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	International Sales	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Net Sales	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Less: Costs of Sales	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Standard Margin	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Less: Other Mfg Costs, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, Manufacturing Margin	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Mfg Management Exp.	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Freight	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, Other Costs of Goods Sold	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Distribution Margin	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Research & Development	--	3	2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5
	Research & Dev. Milestones	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, R&D	--	3	2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5
0%	Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	SG&A (Mkt, Salesforce, Admin)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Division Margin	--	(3)	(2)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	(5)
0%	Taxes	--	(1)	(1)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	(1)
	Net Income	--	(2)	(2)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	(4)

Discount Rate	12.5%	
Division Margin Analysis	NPV	($5) (15 year analysis)
	IRR	#DIV/0! (15 year analysis)
R&D to Launch		$ (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		-1.00 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		-- (2003-2006 Revenues)
Long-Term Division Margin		-- (2007-2011 Division Margin)
Peak Year Margin		--
Expected Value (EV)		($5) (15 year analysis)
R&D Cost NPV		$ (15 year analysis)
10th Percentile		($5)

HIGHLY CONFIDENTIAL

ABBT 0003367

ABT- 594	Total – Base

Project Information

Franchise Name: Analgesia
Program Name: ABT-594
Abbreviated Program Name: ABT-594
Project Title: Neuro Pain
Abbreviated Project Title: Neuro
ABT#: ABT-594
Patent Expiration: 2016
Current Phase: II
Project Type: Development
Project Goal: Indication

Development Timeline

Antifacts:	Quarter	Year	Funding
Pre-Clin	1	1997	--
Ph I	3	1997	--
Ph II	3	1998	17
Ph III	1	2002	126
Filing (NDA/BLA, Publication)	3	2003	--
Launch	3	2004	

Contact Information:

PPD Commercial Contact:	Andrea Landsberg
AI Commercial Contact:	Laura Robinson
R&D Contact:	Barbara Munoz

		LRP																
% Base Sales	Year 0 2000	Year 1 2001	Year 2 2002	Year 3 2003	Year 4 2004	Year 5 2005	Year 6 2006	Year 7 2007	Year 8 2008	Year 9 2009	Year 10 2010	Year 11 2011	Year 12 2012	Year 13 2013	Year 14 2014	Year 15 2015	Year 16 2016	Nominal Total
Domestic Sales	--	--	--	--	27	96	197	228	288	333	329	303	282	268	278	289	199	3,092
International Sales	--	--	--	--	4	39	101	183	243	332	343	380	383	390	378	358	287	3,419
Net Sales	--	--	--	--	31	135	298	346	531	665	692	682	675	687	657	628	493	6,511
Less: Cost of Sales	--	--	--	--	2	13	28	43	66	76	81	81	80	79	76	69	59	755
Standard Margin	--	--	--	--	29	122	241	353	473	589	612	601	594	587	576	553	435	5,755
Less: Other Mfg Costs, Net	--	--	--	--	0	0	1	2	2	3	4	4	4	4	4	4	3	34
Subtotal, Manufacturing Margin	--	--	--	--	28	122	240	351	470	586	609	597	590	583	575	550	422	5,721
Mfg Management Exp	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Freight	--	--	--	--	0	2	3	7	10	13	14	14	14	14	13	11	9	127
Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, Other Cost of Goods Sold	--	--	--	--	0	2	3	7	10	13	14	14	14	14	13	11	9	127
Distribution Margin	--	--	--	--	28	120	235	344	460	572	594	583	576	568	563	539	413	5,595
Research & Development	--	17	56	56	22	--	--	--	--	--	--	--	--	--	--	--	--	154
Research & Dev Milestones	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, R & D	--	17	56	56	22	--	--	--	--	--	--	--	--	--	--	--	--	154
Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SG&A (Mkt, Salesforce, Admin)	--	--	--	6	58	120	88	84	82	68	76	76	85	86	69	69	37	1,004
Division Margin	--	(17)	(56)	(61)	(52)	(1)	136	260	368	494	518	507	510	503	495	470	376	4,437
Taxes	--	(4)	(14)	(16)	(18)	(2)	35	58	83	102	106	96	95	93	91	90	66	865
Net Income	--	(13)	(43)	(46)	(34)	1	101	197	285	392	412	411	415	409	404	380	311	3,572

Pre-Clinical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phase I	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phase II	--	17	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	17
Phase III	--	--	56	56	11	--	--	--	--	--	--	--	--	--	--	--	--	126
Phase IV	--	--	--	--	11	--	--	--	--	--	--	--	--	--	--	--	--	11
Total R&D	--	17	56	56	22	--	--	--	--	--	--	--	--	--	--	--	--	154
		okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay

Discount Rate	12.5%	
Division Margin Analysis	NPV=	1,181 (15 year analysis)
	IRR=	54% (15 year analysis)
R&D to Launch		143 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		1.26 (ENPV of D&I for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		434 (2003-2006 Revenues)
Long-Term Division Margin		2,122 (2007-2011 Division Margin)
Peak Year Margin		518
Expected Value (EV)		162 (15 year analysis)
R&D Cost NPV		126 (15 year analysis)
Project Expected NPV		187
Probabilistic Prod Index		1.04

Success Probabilities

	Preclin	Ph I	Ph II	Ph III*	Launch
Abbott (history)	68%	57%	58%	67%	15%
Lehman/Zeneca	40%	70%	50%	60%	8%
CMRI	50%	75%	51%	65%	12%
A. Little (L)	5%	15%	20%	50%	0%
A. Little (M)	31%	39%	50%	74%	4%
A. Little (H)	50%	77%	67%	100%	26%
ABT Proj. - Base	100%	100%	22%	70%	15%
ABT Proj. - Upside	100%	100%	22%	70%	15%
ABT Proj. - Low	100%	100%	22%	70%	15%

* Includes registration

HIGHLY CONFIDENTIAL

ABBT 0003368

ABT- 594	Total ~ Upside

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales	--	--	--	--	65	126	216	323	423	488	475	448	406	363	388	349	320	4,403
International Sales	--	--	--	--	5	28	196	331	476	664	718	748	740	746	740	703	663	6,998
Net Sales	--	--	--	--	83	210	412	654	899	1,150	1,193	1,196	1,146	1,109	1,093	1,052	983	11,399
Less: Costs of Sales	--	--	--	--	5	18	38	62	86	112	117	118	117	116	113	107	98	1,092
Standard Margin	--	--	--	--	58	192	374	592	813	1,038	1,076	1,078	1,030	1,015	995	946	885	10,307
Less: Other Mfg Costs, Net	--	--	--	--	0	1	2	3	5	7	7	7	8	7	7	7	6	67
Subtotal, Manufacturing Margin	--	--	--	--	58	191	372	589	808	1,031	1,069	1,072	1,022	1,007	988	938	879	9,934
Mfg Management Exp.	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Freight	--	--	--	--	1	4	8	13	18	23	25	27	27	26	22	21	17	235
Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, Other Costs of Goods Sold	--	--	--	--	1	4	8	13	18	23	25	27	27	26	22	21	17	235
Distribution Margin	--	--	--	--	57	188	364	576	790	1,007	1,044	1,045	995	981	966	917	862	9,699
Research & Development	--	17	56	56	22	--	--	--	--	--	--	--	--	--	--	--	--	154
Research & Dev. Milestones	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, R&D	--	17	56	56	22	--	--	--	--	--	--	--	--	--	--	--	--	154
Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SG&A (Nbr, Salesforce, Admin)	--	--	--	--	6	36	70	88	87	84	81	81	79	73	73	65	61	1,059
Division Margin	--	(17)	(56)	(55)	(22)	87	295	477	683	914	956	959	915	940	893	852	792	8,485
Taxes	--	(4)	(14)	(18)	(9)	13	53	93	131	182	159	146	136	128	123	118	111	1,337
Net Income	--	(13)	(42)	(46)	(17)	65	212	384	551	732	797	809	799	782	770	734	681	7,155

Discount Rate	12.5%	
Division Margin Analysis	NPV	2,471 (15 year analysis)
	IRR	78% (15 year analysis)
R&D to Launch		145 (Total of all Pre-dev, Ph I, Ph II, Ph III costs)
Productivity Index		2.71 (ENPV of TAM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		586 (2003-2006 Revenue)
Long-Term Division Margin		3,997 (2007-2017 Division Margin)
Peak Year Margin		959
Expected Value (EV)		350 (15 year analysis)
R&D Cost NPV		120 (15 year analysis)
90th Percentile		1,191

HIGHLY CONFIDENTIAL

ABBT 0003369

ABT- 594	Total – Low

		LRP																	
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
%	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales	---	---	---	---	20	84	94	92	90	90	90	88	82	77	74	87	83	906
International Sales	---	---	---	---	1	15	28	32	59	129	130	136	137	135	134	127	102	1,228
Net Sales	---	---	---	---	21	99	72	125	149	209	220	224	219	213	208	195	185	2,134
6% Less: Costs of Sales	---	---	---	---	2	8	8	14	20	25	27	28	26	27	24	25	20	226
Standard Margin	---	---	---	---	20	91	64	110	142	184	193	196	191	186	178	170	144	1,378
0% Less: Other Mfg Costs, Net	---	---	---	---	0	0	0	1	1	1	1	1	1	1	1	1	1	12
Subtotal, Manufacturing Margin	---	---	---	---	20	91	63	109	140	183	192	195	190	184	177	169	143	1,366
Mfg Management Exp.	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Project Expense	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
0% Royalties, Net	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
0% Freight	---	---	---	---	0	1	1	3	3	5	5	5	5	5	4	4	3	44
Dist. & Public Warehouse	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Subtotal, Other Costs of Goods Sold	---	---	---	---	0	1	1	3	3	5	5	5	5	5	4	4	3	44
Distribution Margin	---	---	---	---	19	89	62	107	145	178	187	190	185	179	173	164	140	1,819
Research & Development	---	17	59	56	22	---	---	---	---	---	---	---	---	---	---	---	---	154
Research & Dev. Milestones	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Subtotal, R&D	---	17	59	56	22	---	---	---	---	---	---	---	---	---	---	---	---	154
0% Medical	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
6% SG&A (Mkt, Salesforce, Admin)	---	---	---	5	58	120	99	78	68	61	58	57	60	48	48	47	33	825
Division Margin	---	(17)	(59)	(61)	(60)	(31)	(37)	28	78	117	131	133	125	131	125	117	109	840
0% Taxes	---	(6)	(19)	(19)	(18)	(6)	(13)	5	17	23	25	24	23	23	20	18	17	123
Net Income	---	(13)	(44)	(48)	(42)	(25)	(24)	23	62	94	106	109	102	110	105	99	91	717

Discount Rate	12.5%	
Division Margin Analysis	NPV	89 (15 year analysis)
	IRR	15% (15 year analysis)
R&D to Launch		143 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		-0.65 (EMPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		182 (2003-2006 Revenues)
Long-Term Division Margin		487 (2007-2011 Division Margin)
Peak Year Margin		135
Expected Value (EV)		(6) (15 year analysis)
R&D Cost NPV		129 (15 year analysis)
10th Percentile		(17)

HIGHLY CONFIDENTIAL

ABBT 0003370

ABT- 594	Total ~ Base

Project Information

Franchise Name: Pain
Program Name: ABT-594
Abbreviated Program Name: ABT-594
Project Title: Nociceptive Pain
Abbreviated Project Title: Nociceptive Pain
ABT#: ABT-594
Patent Expiration: 2016
Current Phase: II
Project Type: Development
Project Goal: Publication

Development Timeline

Initiate:	Quarter	Year	Funding
Pre-Clin	1	1997	--
Ph I	3	1997	--
Ph II	3	1998	5
Ph III	0	0	--
Filing (NDA/sNDA Submission)	3	2005	--
Launch	3	2006	

Contact Information:

PPD Commercial Contact:	Andrea Landsberg
At Commercial Contact:	Laura Robinson
R&D Contact:	Barbara Matao

	LRP																
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Nominal
% Base Sales	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Domestic Sales	--	--	--	--	--	--	6	9	12	15	16	16	16	15	15	14	14	149
International Sales	--	--	--	--	--	--	3	7	10	14	18	18	19	20	19	19	19	186
Net Sales	--	--	--	--	--	--	9	16	22	29	34	35	35	35	34	34	33	335
Less: Cost of Sales	--	--	--	--	--	--	1	1	2	2	3	3	3	3	3	3	3	28
Standard Margin	--	--	--	--	--	--	8	14	20	27	31	32	32	32	31	31	30	288
Less: Other Mfg Costs, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, Manufacturing Margin	--	--	--	--	--	--	8	14	20	27	31	32	32	32	31	31	30	288
Mfg. Management Exp.	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Royalties, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Freight	--	--	--	--	--	--	0	0	1	1	1	1	1	1	1	1	1	10
Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Subtotal, Other Cost of Goods Sold	--	--	--	--	--	--	0	0	1	1	1	1	1	1	1	1	1	10
Distribution Margin	--	--	--	--	--	--	8	13	19	26	30	31	31	31	30	30	29	278
Research & Development	--	3	2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5
Research & Dev. Milestones	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Subtotal, R&D	--	3	2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5
Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SG&A (Mkt, Salesforce, Admin)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Division Margin	--	(3)	(2)	--	--	--	8	13	19	26	30	31	31	31	30	30	29	275
Taxes	--	(1)	(1)	--	--	--	3	5	6	10	12	12	12	12	12	12	12	105
Net Income	--	(2)	(1)	--	--	--	5	8	12	16	18	19	19	19	18	18	18	165

Pre-Clinical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phase I	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5
Phase II	--	3	2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Phase III	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phase IV	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	31
Total R&D		3	2															
		okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	

Discount Rate	12.5%	
Division Margin Analysis	NPV=	74 (15 year analysis)
	IRR=	59% (15 year analysis)
R&D to Launch		5 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		0.17 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		12 (2003-2006 Revenues)
Long-Term Division Margin		119 (2007-2011 Division Margin)
Peak Year Margin		31
Expected Value (EV)		1 (15 year analysis)
R&D Cost NPV		5 (15 year analysis)
Project Expected NPV		2
Probabilistic Prod Index		0.39

Success Probabilities

	Preclin	Ph I	Ph II	Ph III*	Launch
Abbott (history)	68%	57%	56%	67%	15%
Lehman/Zeseca	40%	70%	50%	60%	8%
CMRI	50%	75%	51%	65%	12%
A. Little (L)	6%	15%	20%	50%	6%
A. Little (M)	31%	39%	50%	74%	4%
A. Little (H)	50%	77%	87%	100%	26%
ABT Proj. - Base	100%	100%	50%	15%	8%
ABT Proj. - Upside	100%	100%	50%	15%	8%
ABT Proj. - Low	100%	100%	50%	15%	8%

* Includes registration

HIGHLY CONFIDENTIAL

ABBT 0003416

ABT- 594	Total ~ Upside

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales	-	-	-	-	-	-	5	10	15	21	27	27	26	27	26	26	26	260
International Sales	-	-	-	-	-	-	1	5	11	18	24	32	35	34	35	34	34	235
Net Sales	-	-	-	-	-	-	6	15	27	39	51	59	61	61	61	60	59	495
Less: Costs of Sales	-	-	-	-	-	-	0	1	2	3	4	5	5	6	5	5	5	46
Standard Margin	-	-	-	-	-	-	5	14	24	35	47	54	55	56	56	54	54	507
Less: Other Mfg Costs, Net	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal, Manufacturing Margin	-	-	-	-	-	-	5	14	24	35	47	54	55	56	56	54	54	507
Mfg. Management Exp.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Project Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Royalties, Net	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Freight	-	-	-	-	-	-	0	0	1	1	2	2	2	2	2	2	2	17
Dist. & Public Warehouse	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SubTotal, Other Costs of Goods Sold	-	-	-	-	-	-	0	0	1	1	2	2	2	2	2	2	2	17
Distribution Margin	-	-	-	-	-	-	5	14	24	34	45	52	53	54	54	53	52	490
Research & Development	-	3	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Research & Dev. Milestones	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal, R&D	-	3	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Medical	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SG&A (Mkt, Salesforce, Admin)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Division Margin	-	(3)	(2)	-	-	-	5	14	24	34	45	52	53	54	54	53	52	485
Taxes	-	(1)	(1)	-	-	-	2	5	9	14	18	21	21	22	21	21	21	194
Net Income	-	(2)	(1)	-	-	-	3	9	14	20	27	31	32	32	32	32	31	291

Discount Rate	12.5%	
Division Margin Analysis	NPV	353 (15 year analysis)
	IRR	73% (15 year analysis)
R&D to Launch		5 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Probability Index		1.05 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		2± (2003-2006 Revenues)
Long-Term Division Margin		208 (2007-2011 Division Margin)
Peak Year Margin		54
Expected Value (EV)		5 (15 year analysis)
R&D Cost NPV		5 (15 year analysis)
90th Percentile		(6)

HIGHLY CONFIDENTIAL

ABBT 0003417

ABT- 594	Total – Low

LRP

%		Year 0 2000	Year 1 2001	Year 2 2002	Year 3 2003	Year 4 2004	Year 5 2005	Year 6 2006	Year 7 2007	Year 8 2008	Year 9 2009	Year 10 2010	Year 11 2011	Year 12 2012	Year 13 2013	Year 14 2014	Year 15 2015	Year 16 2016	Total
	Domestic Sales	-	---	---	---	---	---	5	8	9	12	15	16	16	15	15	14	14	149
	International Sales							1	3	7	10	13	19	19	20	19	19	19	166
	Net Sales							6	9	16	22	28	34	35	35	34	34	33	317
0%	Less: Cost of Sales							0	1	1	2	2	3	3	3	3	3	3	28
	Standard Margin							5	8	14	20	27	31	32	32	32	31	31	289
0%	Less: Other Mfg Costs, Net							---	---	---	---	---	---	---	---	---	---	---	---
	Subtotal, Manufacturing Margin							5	8	14	20	27	31	32	32	32	31	31	289
	Mfg. Management Exp.							---	---	---	---	---	---	---	---	---	---	---	---
	Project Expense							---	---	---	---	---	---	---	---	---	---	---	---
0%	Royalties, Pmt							---	---	---	---	---	---	---	---	---	---	---	---
0%	Freight							0	0	1	1	1	1	1	1	1	1	1	10
	Dist. & Public Warehouse							---	---	---	---	---	---	---	---	---	---	---	---
	Subtotal, Other Costs of Goods Sold							0	0	1	1	1	1	1	1	1	1	1	10
	Distribution Margin							5	8	13	19	26	30	31	31	31	30	30	279
	Research & Development		3	2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	5
	Research & Dev. Milestones							---	---	---	---	---	---	---	---	---	---	---	---
	Subtotal, R&D		3	2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	5
0%	Medical		---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
0%	SG&A (Mkt, Salesforce, Admin)																		
	Division Margin		(3)	(2)	---	---	---	5	8	13	19	26	30	31	31	31	30	30	279
0%	Taxes		(1)	(1)	---	---	---	1	3	5	8	10	12	12	12	12	12	12	110
	Net Income		(2)	(1)	---	---	---	3	5	8	12	16	18	19	19	19	18	18	165

Discount Rate	12.5%	
Division Margin Analysis	NPV	74 (15 year analysis)
	IRR	58% (15 year analysis)
R&D to Launch		5 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		0.17 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		12 (2003-2006 Revenues)
Long-Term Division Margin		110 (2007-2011 Division Margin)
Peak Year Margin		31
Expected Value (EV)		1 (15 year analysis)
R&D Cost NPV		5 (15 year analysis)
Unit Percentile		(5)

HIGHLY CONFIDENTIAL

ABBT 0003418

EXHIBIT C

ABT- 773	Total – Base

Project Information

Franchise Name: Anti-Infective
Program Name: ABT-773 (Ketolide)
Abbreviated Program Name: ABT-773
Project Title: Tablet
Abbreviated Project Title: Tablet
ABT#: ABT-773
Patent Expiration: 2016
Current Phase: III
Project Type: Development
Project Goal: Indication

Development Timeline

Initiate:	Quarter	Year	Funding
Pre-Clin	2	1997	...
Ph I	4	1997	...
Ph II	3	1999	...
Ph III	4	2000	222
Filing (NDA/JNDA/CNDA, Pediatrics)	3	2003	...
Launch	3	2004	...

Contact Information:

Domestic Contact:	Rod Maag
International Contact:	Laura Robinson
R&D Contact:	Bill Brown

	Year 0	Year 1	Year 2	Year 3	LRP Year 4	LRP Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Nominal
% Base Sales	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Domestic Sales					87	109	152	211	272	328	333	316	305	290	274	259	243	3,105
International Sales					71	71	142	200	250	280	290	299	278	262	249	236	223	2,780
Net Sales					77	180	294	410	522	608	623	605	576	551	523	495	467	5,885
Less: Cost of Sales					3	26	36	47	57	64	63	60	57	53	50	47	44	607
Standard Margin					15	154	257	363	466	555	560	546	521	498	473	448	423	5,278
Less: Other Mfg. Costs, Net																		
Subtotal, Manufacturing Margin					15	154	257	363	466	555	560	546	521	498	473	448	423	5,278
Mfg. Management Exp.																		
Project Expense																		
Royalties, Net					1	10	17	24	30	36	36	35	34	32	30	29	27	341
Freight					0	3	5	8	10	12	12	12	11	11	10	10	9	116
Cost of Public Warehouse																		
Subtotal, Other Cost of Goods Sold					1	14	23	32	41	48	48	47	46	43	40	38	36	456
Distribution Margin					14	140	235	331	424	507	511	499	477	455	433	410	387	4,822
Research & Development		68	68	46	36	36												276
Research & Dev. Modifiers																		
Subtotal, R & D		68	68	46	36	36												276
Medical																		
SG&A (Mkt, Salesforce, Admin)				2	57	150	181	165	156	207	183	183	167	155	145	340	128	2,114
Division Margin		(68)	(68)	(50)	(60)	(75)	54	140	278	300	319	314	310	300	288	274	259	2,432
Taxes			(21)	(15)	(24)	(23)	18	43	86	85	95	92	93	83	102	100	96	919
Net Income		(68)	(47)	(34)	(36)	(52)	37	104	193	215	224	222	218	208	185	175	163	1,513

Pre-Clinical																		
Phase I																		
Phase II																		222
Phase III		68	68	46	36													54
Phase IV					18	36												276
Total R&D		68	68	46	36	36												
		okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	okay	
Cum R&D Dollars		68	68	46	36	36												

Discount Rate	12.5%	
Division Margin Analysis	NPV=	509 (15 year analysis)
	IRR=	29% (15 year analysis)
R&D to Launch		222 (Total of all Pre-Clin, Ph I, Ph II, Ph III costs)
Productivity Index		0.96 (ENPV of Div for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		491 (2003-2006 Revenues)
Long-Term Division Margin		1,308 (2007-2011 Division Margin)
Peak Year Margin		319
Expected Value (EV)		226 (15 year analysis)
R&D Cost NPV		234 (15 year analysis)
Project Expected NPV		259
Probabilistic Prod Index		1.52

Success Probabilities

	Preclin	Ph I	Ph II	Ph III*	Launch
Abbott (history)	68%	57%	55%	67%	85%
Lehman/Zeneca	40%	70%	50%	80%	8%
CMRI	50%	75%	51%	65%	12%
A. Little (L)	5%	15%	20%	50%	0%
A. Little (M)	31%	39%	50%	74%	4%
A. Little (H)	50%	77%	87%	100%	26%
ABT Proj. - Base	100%	100%	100%	60%	60%
ABT Proj. - Upside	100%	100%	100%	60%	60%
ABT Proj. - Low	100%	100%	100%	60%	60%

* Includes registration

HIGHLY CONFIDENTIAL

ABBT 0003443

ABT- 773	Total – Upside

	LRP																
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Domestic Sales					32	202	280	360	503	608	685	606	597	566	576	564	551	6,110
International Sales						97	195	274	342	388	386	398	378	358	341	324	308	3,813
Net Sales					32	299	475	663	848	1,006	1,013	1,004	975	945	917	888	859	9,923
Less: Costs of Sales					6	39	53	70	85	95	94	91	87	82	78	76	73	931
Standard Margin					26	260	422	593	761	911	919	913	887	863	837	812	786	8,992
Less: Other Mfg Costs, Net																		
Subtotal, Manufacturing Margin					26	260	422	593	761	911	919	913	887	863	837	812	786	8,992
Mfg. Management Exp.																		
Project Expense																		
Royalties, Net					2	17	27	36	45	56	58	58	56	54	20	19	18	477
Freight					0	5	9	12	15	18	18	18	17	17	18	18	9	159
Dist. & Public Warehouse																		
Subtotal, Other Costs of Goods Sold					2	22	36	50	61	76	77	76	74	71	31	29	28	636
Distribution Margin					26	238	386	542	697	835	843	837	814	792	807	782	758	8,356
Research & Development		68	68	46	36	36												276
Research & Dev. Milestones																		
Subtotal, R&D		68	68	46	36	36												276
Medical																		
SG&A (Mkt, Salesforce, Admin)				2	57	180	161	185	198	207	183	165	167	155	142	133	125	2,107
Division Margin		(68)	(68)	(50)	(95)	22	200	358	501	628	660	652	647	637	664	648	633	5,972
Taxes			(21)	(15)	(21)	10	62	83	116	150	160	151	152	152	176	173	169	1,518
Net Income		(68)	(47)	(34)	(42)	4	138	275	385	478	500	502	495	485	488	476	463	4,454

Discount Rate	12.5%	
Division Margin Analysis	NPV	1,660 (15 year analysis)
	IRR	40% (15 year analysis)
R&D to Launch		22% (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		3.68 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		605 (2003-2006 Revenue)
Long-Term Division Margin		2,780 (2007-2011 Division Margin)
Peak Year Margin		964
Expected Value (EV)		357 (15 year analysis)
R&D Cost NPV		234 (15 year analysis)
90th Percentile		1,590

HIGHLY CONFIDENTIAL

ABBT 0003444

ABT- 773	Total ~ Low

%		LRP																
		Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Total
		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
	Domestic Sales	--	--	--	--	9	54	75	104	134	162	184	198	185	167	141	135	128	1,565
	International Sales	--	--	--	--	--	48	98	137	172	200	209	200	190	165	171	163	154	1,911
	Net Sales	--	--	--	--	9	102	172	241	306	362	394	398	345	327	312	297	283	3,476
9%	Less: Costs of Sales	--	--	--	--	1	14	21	27	33	39	39	35	33	31	29	26	25	350
	Standard Margin	--	--	--	--	7	88	152	214	273	328	326	335	310	297	283	269	259	3,126
0%	Less: Other Mfg Costs, Net	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, Manufacturing Margin	--	--	--	--	7	88	152	214	273	328	326	335	310	297	283	269	259	3,126
	Mfg. Management Exp.	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Project Expense	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	Royalties, Net	--	--	--	--	0	6	10	14	18	21	21	21	20	18	16	15	0	180
0%	Freight	--	--	--	--	0	2	4	5	7	8	8	8	7	7	5	5	5	69
	Dist. & Public Warehouse	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, Other Costs of Goods Sold	--	--	--	--	1	8	14	19	24	29	29	29	27	25	21	19	14	249
	Distribution Margin	--	--	--	--	7	80	138	195	249	297	299	306	283	271	262	250	242	2,877
	Research & Development	--	68	66	48	36	36	--	--	--	--	--	--	--	--	--	--	--	279
	Research & Dev. Milestone	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	Subtotal, R&D	--	68	66	48	36	36	--	--	--	--	--	--	--	--	--	--	--	279
0%	Medical	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
0%	SG&A (Mkt, Salesforce, Admin)	--	--	--	2	57	160	181	185	196	207	193	186	167	166	142	139	125	2,107
	Division Margin	--	(68)	(66)	(50)	(86)	(116)	(43)	10	53	90	106	119	116	105	120	111	117	491
0%	Taxes	--	--	(21)	(16)	(28)	(38)	(23)	(22)	(18)	(13)	7	9	11	12	18	15	13	(55)
	Net Income	--	(68)	(47)	(34)	(58)	(106)	(20)	32	59	91	100	107	105	104	109	107	104	550

Discount Rate	12.5%	
Division Margin Analysis	NPV	(112) (15 year analysis)
	IRR	7% (15 year analysis)
R&D to Launch		222 (Total of all Pre-clin, Ph I, Ph II, Ph III costs)
Productivity Index		-0.63 (ENPV of DM for 15 years / NPV of R&D for 15 years)
Short-Term Revenue		265 (2003-2005 Revenues)
Long-Term Division Margin		370 (2002-2011 Division Margin)
Peak Year Margin		125
Expected Value (EV)		(147) (15 year analysis)
R&D Cost NPV		234 (15 year analysis)
10th Percentile		(222)

HIGHLY CONFIDENTIAL

ABBT 0003445

EXHIBIT T

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and MANULIFE INSURANCE COMPANY (f/k/a INVESTORS PARTNER INSURANCE COMPANY), Plaintiffs, v. ABBOTT LABORATORIES, Defendant.	CIVIL ACTION NO. 05-11150-DPW

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a Investors Partner Insurance Company) (collectively, "John Hancock") will take the deposition of defendant Abbott Laboratories on April 12, 2007 commencing at 9:30 a.m. at the offices of Levenfeld Pearlstein, LLC, 2 North LaSalle Street, Suite 1300, Chicago, Illinois, or such other location as may be mutually agreed to by the parties. Abbott shall designate, prepare and produce one or more knowledgeable officers, directors, or other representatives to testify on its behalf as to the topics set forth below.

PLEASE TAKE FURTHER NOTICE that the deposition noticed above will be recorded stenographically, and through real-time court reporting, such as by LiveNote. The deposition also may be recorded by audio or video technology, such as videotape. The deposition will be taken before a notary public or other person authorized to administer oaths and will continue from day-to-day until completed, Saturdays, Sundays and holidays excepted.

Definitions

For purposes of this Notice, John Hancock adopts the "Uniform Definitions in Discovery Requests" contained in Local Rule 26.5. The following additional terms shall have the meanings set forth below:

1. "You," "your" and "Abbott" shall mean defendant Abbott Laboratories, its various corporate parents, subsidiaries, affiliates, subdivisions and departments, and any and all representatives, successors, assigns, officers, directors, employees, agents, attorneys or other persons or entities who have acted or purported to act for or on behalf of any of them.

2. "Abbott's Senior Management" shall mean the Abbott personnel who had or have overall responsibility, authority and accountability for managing Abbott's Global Pharmaceutical Research and Development organization and operations, including, without limitation, Miles D. White and the "Senior Management" referenced in Abbott Document No. ABBT0101924.

3. "John Hancock" shall mean collectively defendants John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a Investors Partner Life Insurance Company), their various subsidiaries, affiliates, divisions and departments, and any and all representatives, successors, assigns,

officers, directors, employees, agents, auditors, attorneys or other persons or entities who have acted or purported to act for or on behalf of any of them, including, without limitation, representatives of the StoneTurn Group.

4. The "Research Funding Agreement" shall mean the Research Funding Agreement by and between Abbott and John Hancock, dated as of March 13, 2001.

5. The "Program Compounds" shall have the meaning set forth in the Research Funding Agreement.

6. "Program Term" shall have the meaning set forth in the Research Funding Agreement.

7. "Regarding" shall have the same meaning as "concerning."

8. "Any" also shall mean "all," and "all" also shall mean "any."

9. "And" as well as "or" shall be construed both disjunctively and conjunctively to mean "and/or."

Topics Of Examination

1. Abbott's knowledge and belief concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-518 as of March 13, 2001.

2. Abbott's knowledge and belief concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-594 as of March 13, 2001.

3. Abbott's knowledge and belief concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-773 as of March 13, 2001.

4. The knowledge and belief of each member of Abbott's Senior Management concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-518 as of March 13, 2001.

5. The knowledge and belief of each member of Abbott's Senior Management concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-594 as of March 13, 2001.

6. The knowledge and belief of each member of Abbott's Senior Management concerning the prospects and condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-773 as of March 13, 2001.

7. Abbott's valuation of, and methods for valuing (including, without limitation, any models used in such valuations) the Program Compound known as ABT-518 at any time from January 1, 2001 to the present.

8. Abbott's valuation of, and methods for valuing (including, without limitation, any models used in such valuations) the Program Compound known as ABT-594 at any time from January 1, 2001 to the present.

9. Abbott's valuation of, and methods for valuing (including, without limitation, any models used in such valuations) the Program Compound known as ABT-773 at any time from January 1, 2001 to the present.

10. Abbott's nominal or intended and reasonably expected spending on the Program Compound known as ABT-518 at any time from January 1, 2001 to the present.

11. Abbott's nominal or intended and reasonably expected spending on the Program Compound known as ABT-594 at any time from January 1, 2001 to the present.

12. Abbott's nominal or intended and reasonably expected spending on the Program Compound known as ABT-773 at any time from January 1, 2001 to the present.

13. Abbott's reasons for discontinuing or terminating the development of the Program Compound known as ABT-518.

14. Abbott's reasons for discontinuing or terminating the development of the Program Compound known as ABT-594.

15. Abbott's reasons for discontinuing or terminating the development of the Program Compound known as ABT-773.

16. All communications among or between Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the prospects or condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-518.

17. All communications among or between Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the prospects or condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-594.

18. All communications among or between Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the prospects or condition (including safety, efficacy, scientific viability or commercial viability) of the Program Compound known as ABT-773.

19. All communications among and between senior Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the actual or potential discontinuation or termination of development of the Program Compound known as ABT-518.

20. All communications among and between senior Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the actual or potential discontinuation or termination of development of the Program Compound known as ABT-594.

21. All communications among and between senior Abbott's Senior Management, at any time from January 1, 2000 to the present, regarding the actual or potential discontinuation or termination of development of the Program Compound known as ABT-773.

22. The creation of, analysis reflected in, or actions taken by Abbott in connection with, the document attached hereto as Exhibit A as it pertains to the Program Compounds known as ABT-518, ABT-594 and ABT-773.

23. The creation of, analysis reflected in, or actions taken by Abbott in connection with, the document attached hereto as Exhibit B as it pertains to the Program Compounds known as ABT-518, ABT-594 and ABT-773.

24. The creation of, analysis reflected in, or actions taken by Abbott in connection with, the document attached hereto as Exhibit C as it pertains to the Program Compound known as ABT-594.

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and MANULIFE INSURANCE COMPANY (f/k/a INVESTORS PARTNER INSURANCE COMPANY)

By its attorneys,

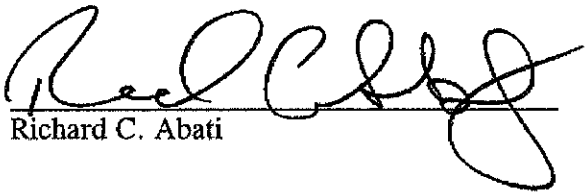
Brian A. Davis (BBO No. 546462)
Joseph H. Zwicker (BBO No. 560219)
Karen Collari Troake (BBO No. 566922)
Richard C. Abati (BBO No. 651037)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
Tele: (617) 248-5000
Fax: (617) 248-4000

Date: March 30, 2007

4191661.1

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by electronic and overnight mail upon Peter E. Gelhaar, Esq., Donnelly, Conroy & Gelhaar, LLP, One Beacon Street, 33rd Floor, Boston, MA 02108, and Gregory D. Phillips, Esq., Munger, Tolles & Olson LLP, 355 South Grand Avenue, Los Angeles, CA 90071, on this 30th day of March, 2007.



Richard C. Abati

Exhibit A

INITIAL PORTFOLIO PRIORITIZATION

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Anti-Infectives				
ABT-492	C	• Address safety issues (including QTc) with internal/ expert review • Determine how many indications at launch (pay back)	• J. Leonard	-
HSR-903	T	• Consider trading with Daiichi • Halt any new expenditure	• J. Tyree	-
ABT-773	C	• Assess side effects issues with expert review (QTc and liver tox.) • Ensure all drug interactions are adequately covered • Assess relative to Ketek	• J. Leonard • J. Leonard • I. Loew	-
Urology				
BSF 420627	P	• Set up task force to address issues and bring back plan to senior management – Reasons for failure of the SKB ETa/b antagonist – Design short (~4 week) PoP trial for symptom relief – Rationale for sustained release formulation – Nature of the Schwarz Pharma relationship	• J. Leonard	• By May
Hypothyroidism				
T3/T4	P	• Assess most appropriate ratio • Gain FDA feedback on study design • Determine ex-US market attractiveness (price)	• J. Leonard	• By May
Asthma				
Hokunalin tape	P	• Conduct market research on acceptance by different patient segments • Determine how to position against long acting beta agonists and combination inhalers • Evaluate opportunity to gain complete access to the patch technology	• A. Higgins/ E. Florentino • J. Tyree	• May

0 0

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Oncology ABT-510	C	• Pursue proof of concept • Leverage TAP knowledge of angiogenesis product development (appropriate endpoints)	• Project team	• As planned
ABT-751	C	• Pursue proof of concept • Use echocardiogram to monitor potential cardiotoxicity • Resolve potent drug manufacturing approach	• Project team • CMC group	• As planned
ABT-518	Hold	• Wait for May results from Pfizer (will save ~$1mill) and re-evaluate • Halt all further expenditure	• Senior management	• May
Rubitecan	P	• Significant clinical rework required (funded by partner)- further in-depth review required • Make a proceed decision when 2Q data available	• J. Leonard	• By May
Theragyn	P	• Negative initial scientific perspective - further in-depth review required, e.g., – Determine if there is a PoC to support claim – Address GMP issues – Determine best control to demonstrate efficacy • Re-look at partnership contract	• J. Leonard • J. Tyree	• By May • By May
ABT-627	C	• Seek alternative funding (e.g., NCI) before starting major trial • If move ahead – Determine how to ensure NDA filing in 2004 – Get FDA input since survival not primary endpoint – Harmonize US and EU study design and inputs • Consider partnership (e.g., BI or established oncology player)	• J. Leonard, P. Nisen • J. Tyree	• ASAP • By May

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Cardiology/ thrombosis Darusentan (LU 135252)	Hold	• Continue currently budgeted funding for next 6 months • Do not start any new trials (e.g., hypertension planned for May) • If proceed, plan for pilot to look at effects in sperm and teratogenecity • Consider out-license or swap	• Project team • J. Tyree	• Ongoing • ASAP
LU 208075	Hold	• Continue currently budgeted funding for next six months • Look at Myogen deal • Out-license or swap	• Project team • J. Tyree	• ongoing
Levosimendan	C	• Conduct detailed expert panel review for trial design	• J. Leonard	• May
PEG-Insulin	P	• Set up expert panel for commercial assessment (is diabetes an option?)	• E. Ogunro	• By May
Ancrod	T	• Identify out-licensing opportunities	• J. Tyree	• TBD
Urokinase	P	• Market research required on open cath • Match versus tPA in dose-ranging studies to determine efficacy	• E. Fiorentino	• By May
Pro-urokinase	C	• Identify opportunities to speed up program	• Project team	• TBD
Clivarine	C	• Assessment by HPD (review previous evaluation and new trial data) • Understand finished product manufacturing cost	• E. Ogunro • B. Dempsey	• By May
Rythmol SR	C	• Continue filing • Verify if package is likely approvable • Assess commercial attractiveness in a generic market	• Project team	• Ongoing

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Neuroscience ABT 594	P	• Await results from ongoing PII trial – probable T • Project team to develop decision criteria for go/no go	• Senior management	• June/ July
ABT 963	C	• Identify a co-development/co-promotion partner (TAP high on list) • Evaluate benefits of the long half life in pain and cancer (including additional physician market research) • Explore cancer prophylaxis and Alzheimer's indications	• J. Tyree • Project team	• TBD
BSF 201640	P	• Complete review of all schizophrenia NCEs with expert panel • Complete staffing of internal project team, but halt further expenditure beyond looking at hepatic tox. and QTc • Understand Novartis contract and level of interest	• I. Loew • Project team • J. Tyree	• By May
BSF 190555	P	• Complete review as above • Halt further expenditure pending outcome	• I. Loew	• As above
BSF 74398	C	• Allow DevCo to continue development • Re-look at relationship with DevCo	• Project team • J. Tyree	• By May
Dilaudid Oros	Hold	• Return to ALZA or out-license to other interested partner	• J. Tyree	• TBD
Hydrocodone	C	• Assess regulatory pathway • Understand DEA impact on manufacturing	• Project team	• By May
Bimoclomol (ABT 822)	P	• Await data from ongoing trial in April before deciding whether to continue - probable T • Halt further expenditure pending outcome	• Senior management	• April

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Gastro-enterology				
Ganaton	P	• Conduct U.S. commercial assessment with TAP	• E. Florentino	• By June
		• Assess how to position in Europe versus generics and implications for comparative trial		
		• Develop model to assess spend at different termination points	• Bob Funck	• By May
TU-199	T	• Terminate outside Japan	• Project team	• Immediate
AU-224	C	• Develop and pursue a small PoC trial in humans ASAP (consider niche indication first and leverage Marlene's expertise)	• Project team	• ASAP
		• Conduct market research on IBS versus constipation (including pricing)	• E. Florentino	
Immunology				
D2E7	C	• Conduct intensive product review – 2 day meeting with J. Lennard's group (already in process) – ½ day session with senior management group	• J. Leonard	• By May
		• Important actions include – Approach FDA for fast track and compassionate use – Develop strategy for DMARD claim in first submission – Assess need for Enbrel assay to detect HAHAs – Assess delivery device options – Evaluate additional indications (e.g., Psoriasis, Crohns, heart failure) and pediatric program – Profile Celltech product – Assess impact of additional IV program on reimbursement	• Various	• By May
		• Develop list of potential marketing partners for quids	• J. Tyree	

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Immunology *(continued)*				
Segard	Hold	• Continue filing in EU and Canada • Put on hold in US – consider creating a small team in the US to analyse data, propose smaller PII study • Research pricing, marketing and Phase IV plans in Europe • Look at TNF-alpha levels retrospectively to see stratification with IL-8 • Assess manufacturing strategy • Identify potential out-licensing opportunities (Genentech)	• Project team • J. Leonard • J. Tyree	• Ongoing
J695	P	• Decide on most attractive indications from Abbott and partner perspective • Discuss with partner ways to share the various indications and potential for TNF-alpha combinations • Add commercial person to the project team by this week	• E. Florentino • J. Tyree • Ongoing	• ASAP

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
PIV programs Clarithromycin	C	• None identified	-	-
Omnicef	C	• Talk to partners	• J. Tyree	-
Kaletra	C	• None identified	-	-
Norvir	C	• None identified	-	-
Meridia	Hold	• Conduct commercial assessment for CNS and depression (P&L)	• B. Dempsey, J. Arnott, E. Florentino	• ASAP
		• Assess combination therapy with fibrates • Assess outcomes trial design to meet preferred commercial profile; determine payback	• Project team	
Uprima	C	• Ensure no redundant trials with TAP in Europe	• Project team	• Ongoing
Trandolapril patch	T	• Halt all activities	• Project team	• Immediate
Trandolapril "Invest" clinical program	P	• Review trial in more detail (reduce complexity and risk)	• E. Florentio	• By May
Other trandolapril trials	C	• Continue "Create", "Peace" and "Benedict" trial programs	• Project team	• Ongoing
Fenofibrate	C	• Develop co-formulation ideas with Meridia and statins (including assessment of sales and costs)	• Project team	-
Depakote	C	• None identified	-	-
Gengraf	C	• None identified	-	-

Exhibit B

INITIAL PORTFOLIO PRIORITIZATION

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Anti-infectives				
ABT-492	C	• Address safety issues (including QTc) with internal/ expert review • Determine how many indications at launch (pay back)	• J. Leonard	•
HSR-903	T	• Consider trading with Daiichi • Halt any new expenditure	• J. Tyree	•
ABT-773	C	• Assess side effects issues with expert review (QTc and liver tox.) • Ensure all drug interactions are adequately covered • Assess relative to Ketek	• J. Leonard • J. Leonard • I. Loew	•
Urology				
BSF 420627	P	• Set up task force to address issues and bring back plan to senior management – Reasons for failure of the SKB ETa/b antagonist – Design short (~4 week) PoP trial for symptom relief – Rationale for sustained release formulation – Nature of the Schwarz Pharma relationship	• J. Leonard	• By May
Hypothyroidism				
T3/T4	P	• Assess most appropriate ratio • Gain FDA feedback on study design • Determine ex-US market attractiveness (price)	• J. Leonard	• By May
Asthma				
Hokunalin tape	P	• Conduct market research on acceptance by different patient segments • Determine how to position against long acting beta agonists and combination inhalers • Evaluate opportunity to gain complete access to the patch technology	• A. Higgins/ E. Florentino • J. Tyree	• May

0 0

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Oncology				
ABT-510	C	• Pursue proof of concept • Leverage TAP knowledge of angiogenesis product development (appropriate endpoints)	• Project team	• As planned
ABT-751	C	• Pursue proof of concept • Use echocardiogram to monitor potential cardiotoxicity • Resolve potent drug manufacturing approach	• Project team • CMC group	• As planned
ABT-518	Hold/T	• Wait for May results from Pfizer (will save ~$1mill) and re-evaluate • Halt all further expenditure	• Senior management	• May
Rubitecan	P	• Significant clinical rework required (funded by partner)- further in-depth review required • Make a proceed decision when 2Q data available	• J. Leonard	• By May
Theragyn	P	• Negative initial scientific perspective - further in-depth review required, e.g., – Determine if there is a PoC to support claim – Address GMP issues – Determine best control to demonstrate efficacy • Re-look at partnership contract	• J. Leonard • J. Tyree	• By May • By May
ABT-627	C	• Seek alternative funding (e.g., NCI) before starting major trial • If move ahead – Determine how to ensure NDA filing in 2004 – Get FDA input since survival not primary endpoint – Harmonize US and EU study design and inputs • Consider partnership (e.g., BI or established oncology player)	• J. Leonard, P. Nisen • J. Tyree	• ASAP • By May

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Cardiology/ thrombosis				
Darusentan (LU 135252)	Hold/T	• Continue currently budgeted funding for next 6 months • Do not start any new trials (e.g., hypertension planned for May)	• Project team	• Ongoing
		• Consider out-license or swap	• J. Tyree	• ASAP
LU 208075	Hold/T	• Continue currently budgeted funding for next six months	• Project team	• ongoing
		• Look at Myogen deal • Out-license or swap	• J. Tyree	
Levosimendan	C	• Conduct detailed expert panel review for trial design	• J. Leonard	• May
PEG-hirudin	P	• Set up expert panel for commercial assessment (is diabetes an option?)	• E. Ogumo	• By May
Ancrod	T	• Identify out-licensing opportunities	• J. Tyree	• TBD
Urokinase	P	• Market research required on open cath • Match versus tPA in dose-ranging studies to determine efficacy	• E. Fiorentino	• By May
Pro-urokinase	C	• Identify opportunities to speed up program	• Project team	• TBD
Clivarine	C	• Assessment by HPD (review previous evaluation and new trial data)	• E. Ogumo	• By May
		• Understand finished product manufacturing cost	• B. Dempsey	
Rythmol SR	C	• Continue filing • Verify if package is likely approvable • Assess commercial attractiveness in a generic market	• Project team	• Ongoing

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Neuroscience				
ABT 594	P	• Await results from ongoing PII trial -- probable T • Project team to develop decision criteria for go/no go	• Senior management	• June/ July
ABT 963	C	• Identify a co-development/co-promotion partner (TAP high on list) • Evaluate benefits of the long half life in pain and cancer (including additional physician market research) • Explore cancer prophylaxis and Alzheimer's indications	• J. Tyree • Project team	• TBD
BSF 201640	P	• Complete review of all schizophrenia NCEs with expert panel • Complete staffing of internal project team, but halt further expenditure beyond looking at hepatic tox. and QTc • Understand Novartis contract and level of interest	• I. Loew • Project team • J. Tyree	• By May
BSF 190555	P	• Complete review as above • Halt further expenditure pending outcome	• I. Loew	• As above
BSF 74398	C (no cost)	• Allow DevCo to continue development • Re-look at relationship with DevCo	• Project team • J. Tyree	• By May
Dilaudid Oros	Hold/T	• Return to ALZA or out-license to other interested partner	• J. Tyree	• TBD
Hydrocodone	C	• Assess regulatory pathway • Understand DEA impact on manufacturing	• Project team	• By May
Bimoclomol (ABT 822)	P	• Await data from ongoing trial in April before deciding whether to continue - probable T • Halt further expenditure pending outcome	• Senior management	• April

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
Gastro-enterology				
Ganaton	P	• Conduct U.S. commercial assessment with TAP	• E. Florentino	• By June
		• Assess how to position in Europe versus generics and implications for comparative trial		
		• Develop model to assess spend at different termination points	• Bob Punck	• By May
TU-199	T	• Terminate outside Japan	• Project team	• Immediate
AU-224	C	• Develop and pursue a small PoC trial in humans ASAP (consider niche indication first and leverage Marlene's expertise)	• Project team	• ASAP
		• Conduct market research on IBS versus constipation (including pricing)	• E. Florentino	
Immunology				
D2E7	C	• Conduct intensive product review – 2 day meeting with J. Lennard's group (already in process) – ½ day session with senior management group	• J. Leonard	• By May
		• Important actions include – Approach FDA for fast track and compassionate use – Develop strategy for DMARD claim in first submission – Assess need for Enbrel assay to detect HAHAs – Assess delivery device options – Evaluate additional indications (e.g., Psoriasis, Crohns, heart failure) and pediatric program – Profile Celltech product – Assess impact of additional IV program on reimbursement	• Various	• By May
		• Develop list of potential marketing partners for quids	• J. Tyree	

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

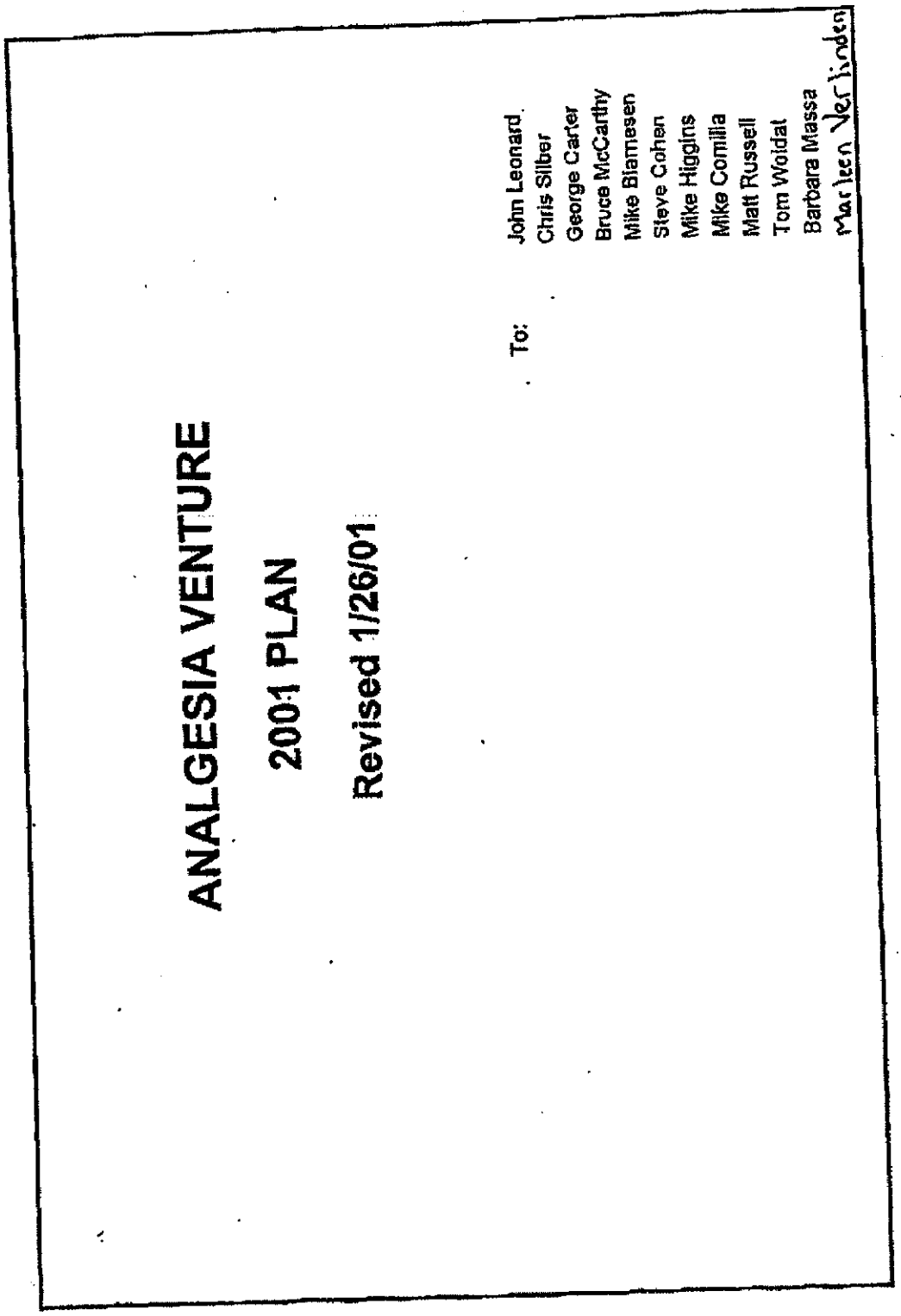
Project	Priority	Next steps	Responsibility	Timing
Immunology *(continued)*				
Segard	Hold	• Continue filing in EU and Canada • Put on hold in US – consider creating a small team in the US to analyse data, propose smaller PII study • Research pricing, marketing and Phase IV plans in Europe • Look at TNF-alpha levels retrospectively to see stratification with IL-6 • Assess manufacturing strategy • Identify potential out-licensing opportunities (Genentech)	• Project team • J. Leonard • J. Tyree	• Ongoing
J695	P	• Decide on most attractive indications from Abbott and partner perspective • Discuss with partner ways to share the various indications and potential for TNF-alpha combinations • Add commercial person to the project team by this week	• E. Florentino • J. Tyree • Ongoing	• ASAP

INITIAL PORTFOLIO PRIORITIZATION (CONTINUED)

C- continue
P- pending
T- terminate

Project	Priority	Next steps	Responsibility	Timing
PIV programs				
Clarithromycin	C	• None identified	-	-
Omnicef	C	• None identified	-	-
Kaletra	C	• None identified	-	-
Norvir	C	• None identified	-	-
Meridia	Hold	• Conduct commercial assessment for CNS and depression (P&L)	• B. Dempsey, J. Arnolt, E. Fiorentino	• ASAP
		• Assess combination therapy with fibrates • Assess outcomes trial design to meet preferred commercial profile; determine payback	• Project team	
Uprima	C	• Ensure no redundant trials with TAP in Europe	• Project team	• Ongoing
Trandolapril patch	T	• Halt all activities	• Project team	• Immediate
Trandolapril "Invest" clinical program	P	• Review trial in more detail (reduce complexity and risk)	• E. Fiorentio	• By May
Other trandolapril trials	C	• Continue "Create", "Peace" and "Benedict" trial programs	• Project team	• Ongoing
Fenofibrate	C	• Develop co-formulation ideas with Meridia and statins (including assessment of sales and costs)	• Project team	-
Depakote	C	• None identified	-	-
Gengraf	C	• None identified	-	-

Exhibit C


ANALGESIA VENTURE
2001 PLAN
Revised 1/26/01
To:
John Leonard
Chris Silber
George Carter
Bruce McCarthy
Mike Blamesen
Steve Cohen
Mike Higgins
Mike Comilla
Matt Russell
Tom Woidat
Barbara Massa
Marleen Vercruysse

Analgesia Venture
2001 PLAN Review (Pass II)
Table of Contents

Analgesia Venture
Summary
2001 PLAN Pass II

	2001 Target	2000 AGU	2001 PLAN	Target vs PLAN Fav(Unfav) Var
ABT - 594	8,900	14,411	9,307	(407) a
ABT - 089	"	3,000	613	(613) b
NPS 1776	"	"	537	(537) c
ABS - 103	"	"	"	" b
ABT - 963	"	4,000	1,186	(1,186) b
Venture Total	8,900	21,411	11,643	(2,743)

a Includes a $120,000 charge from SPD not in Oracle
b Completion of work started in 2000, bringing it to a logical holding position.
c Includes a $490,000 charge from SPD included in Oracle in error.

Analgesia Venture
ABT-594
2001 PLAN KEY STATISTICS Pass II
($000)

Project	2001 Target	2000 AGU	2001 PLAN	Target vs PLAN Fav(Unfav) Var
Neuronal nicotinic receptor antagonist (Milestone Funded to Go/No Go June, 2001)	8,900	14,411	9,307	(407)

Key Milestones / Assumptions	00 AGU	01 PLAN	Status (on target, pending or delayed (n z)
- IND Filing	2/98	2/98	Completed
- Initiate Phase II - U.S.	7/98	7/98	Completed
- Go/No Go Clinical Efficacy (Phase IIa)	9/99	9/99	Completed
- Go/No Go Clinical Efficacy (Phase IIb)	2/01	6/01	Delayed Last patient enrolled 1/5/01, n = 269
- Initiate Phase III - U.S.	9/01	4/02	Delayed
- File NDA U.S./ EMEA EU	5/03	9/03	Delayed

PARD	00 AGU	01 PLAN	
- Analytics Dev & Support	879	641	Analysis F, Support Mitsunobu Chem & Process Justification
- Formulation Dev & Support	745	226	Formulation scale-up and process optimization
- Clinical Finishing	607	145	Completion of M99-114, Paging 3 Ph I study supplies
- Project Management Support	178	63	Coordination of activities and support of go/no go meeting prep
- PARD Total	2,409	1,075	

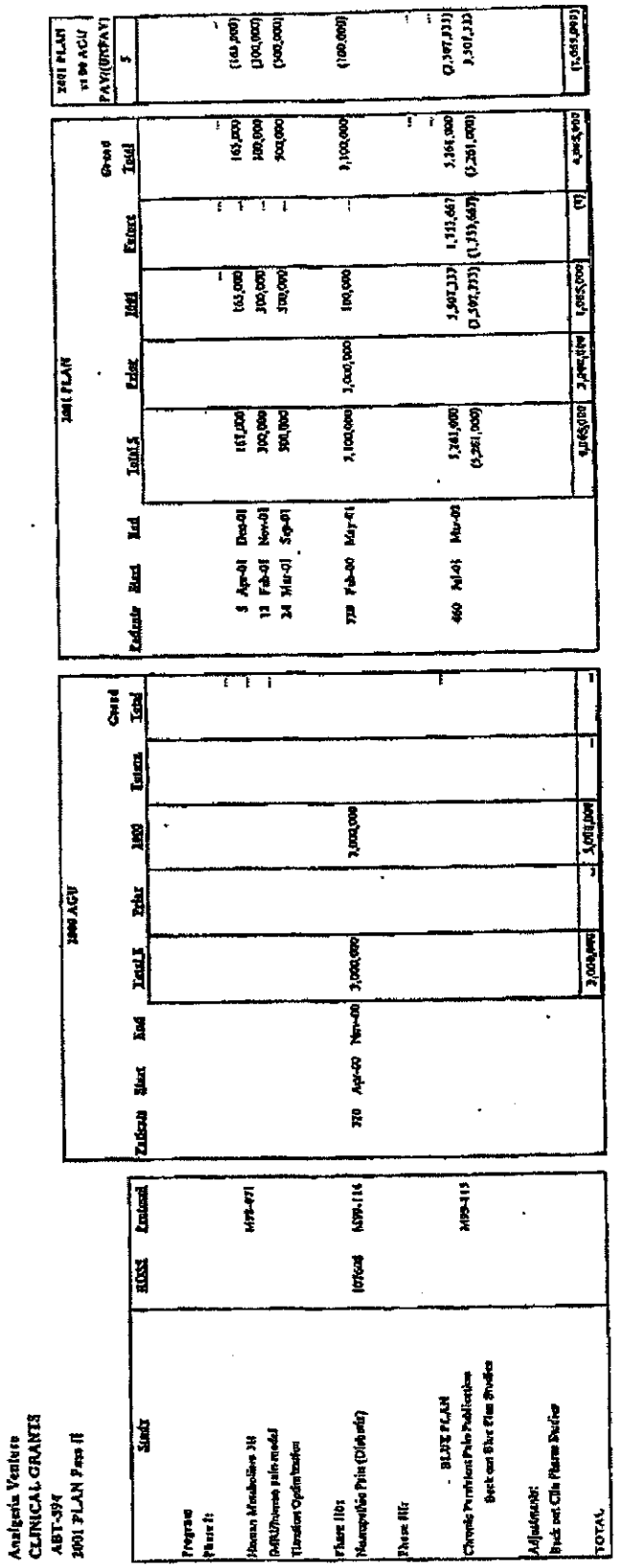
Total Venture Management
- Expense: $3,564 a decrease of $807 resulting from milestone funding.($2,268 represents full year fixed/overhead)
- Authorized Heads: Flat to AGU until July, 2001, ABT-594,Go/No Go Decision, no headcount after July, 2001

SPD Requirements

	Kgs	Heads	Mat'l Cost	Total Cost
2000 AGU	5	1	71	306
2001 PLAN	5	--	120	120

Clinical Grants		1st Patient Dosed	Last CRF	R/ons 2000 AGU Start	R/ons 2000 AGU End	R/ons 2001 PLAN Start	R/ons 2001 PLAN End	Cost Total	Cost 00 AGU	Cost 01 PLAN	Cost Variance
Phase I											
M98-971	Human Metabolism 3H	Apr-01	Nov-01			Apr-01	Dec-01	165		165	
TBD	fMRI	Aug-01	Nov-01			Feb-01	Nov-01	300		300	
TBD	Titration Optimization	Apr-01	Jul-01			Mar-01	Sep-01	500		500	
Phase IIb											
M99-114	Neuropathic Pain	Apr-00	Mar-02	Apr-00	Nov-00	Apr-00	May-01	3,100	3,000	100 A	
Total								4,065	3,000	1,065	1

A Increased cost result of additional CRO monitoring costs.



Analgesia Ventures
CLINICAL GRANTS
ABT-594
2001 PLAN Page II

Study	ROSE	Protocol	2000 AGU Total $	2000 AGU Tybar	2000 AGU 1800	2000 AGU Extera	2000 AGU Grand Total	2001 PLAN Total $	2001 PLAN Tybar	2001 PLAN 1800	2001 PLAN Extera ($)	2001 PLAN Grand Total	2001 PLAN vs 00 AGU PAY/(DEFAY) $
Program													
Phase I:													
Human Metabolism 3H		M99-071						165,000		165,000		165,000	(165,000)
DeRUVitreous pain model								300,000		300,000		300,000	(300,000)
Titration Optimization								300,000		300,000		300,000	(300,000)
Phase IIb:													
Neuropathic Pain (Diabetic)		M99-114	3,000,000		3,000,000		3,000,000	3,100,000	3,000,000	100,000		3,100,000	(100,000)
Phase IIb:													
- BLISS PLAN		M99-115						5,261,000		1,967,333	1,111,667	3,261,000	2,307,333
Chronic Provision Pain Publication								(5,261,000)		(1,967,333)	(1,111,667)	(3,261,000)	(2,307,333)
Back out Blue Fin Studies													
Adjustments:													
Back out Clin Pharm Studies													
TOTAL			3,000,000		3,000,000		3,000,000	4,065,000	3,000,000	1,065,000		4,065,000	(1,065,000)

Study	Patients	Start	End	Total $	Tybar	1800	Extera	Grand Total
Program								
Phase I:								
Human Metabolism 3H	5	Apr-01	Dec-01	165,000				165,000
DeRUVitreous pain model	12	Feb-01	Nov-01	300,000				300,000
Titration Optimization	24	Mar-01	Sep-01	300,000				300,000
Phase IIb:								
Neuropathic Pain (Diabetic)	320	Feb-00	May-01	3,100,000	3,000,000	100,000		3,100,000
Phase III:								
- BLISS PLAN	460	Jul-01	Mar-03	5,261,000		1,967,333	1,111,667	3,261,000
Chronic Provision Pain Publication				(5,261,000)		(1,967,333)	(1,111,667)	(3,261,000)
Back out Blue Fin Studies								
Adjustments:								
Back out Clin Pharm Studies								
TOTAL				4,065,000	3,000,000	1,065,000		4,065,000

PHARMACEUTICAL PRODUCTS RESEARCH AND DEVELOPMENT
2000 AUGUST UPDATE / 2001 PLAN
G0- 143010 CCM ABT594 (BASE & ORAL PAIN)
($000)

4

26-Jan-01 *4:04 PM*	2000 APU	2000 AGU	FAV/(UNFAV) AUG. UPD VS. APR. UPD.	2001 PLAN	FAV/(UNFAV) PLAN VS. AUG. UPD.
PPD INVESTIGATIONAL DR					
PPD Investigational Drug QA	23	55	(32)	86	(32)
	23	55	(32)	86	(32)
Venture Management					
Analgesia/CCM Venture	4,739	4,493	246	3,988	505
	4,739	4,493	246	3,988	505
Discovery					
Advanced Technology	25	50	(25)	26	24
Neurological & Urological Res	...	...	...	51	(51)
	25	50	(25)	77	(28)
Drug Safety					
Experimental Science	23	70	(46)	187	(118)
Clinical Drug Analysis	290	290	...	409	(120)
Toxicology	1,366	896	471	233	663
Pathology	604	572	32	493	79
Comparative Medicine	591	591	...	34	557
Strategic & Exploratory Science	4	...	4	7	(7)
	2,877	2,417	460	1,362	1,055
Pharm Analytical R&D					
ANALYTICS DEV & SUPPORT	791	879	(88)	641	238
FORMULATION DEV & SUPPORT	764	745	19	226	519
CLINICAL FINISHING	403	607	(204)	145	462
PROJECT MGMT SUPPORT	197	178	20	63	115
	2,155	2,409	(254)	1,075	1,334
PHASE-I CENTER					
Phase-I Admin/Pharmacokinetics	185	185	...	259	(74)
ACPRU	23	25	(2)	367	(343)
	208	210	(2)	627	(417)
Development Operations					
Data Management	475	475	...	259	216
Statistics	160	171	(11)	129	42
ABBOTT RES & LIBRARY INF-ARL	89	89	...	140	(51)
	724	735	(11)	528	207
Regulatory Affairs					
Regulatory Affairs	20	20	...	151	(131)
Research QA	131	80	50	82	(1)
	151	100	50	232	(132)
Medical Affairs					
Genetics/Admin	...	...	...	2	(2)
Medical Services	53	53	...	10	43
Outcomes Res./Admin.	42	42	...	37	5
	95	95	...	49	46
Administration					
R&D Operations/Project Services	75	43	32	45	(2)
	75	43	32	45	(2)
AI MANPOWER					
International Manpower	50	20	30	53	(33)

2000 AUGUST UPDATE / 2001 PLAN

G0-143010 CCM ABT594 (BASE & ORAL PAIN)

($000)

26-Jan-01 4:04 PM	2000 APU	2000 AGU	FAV/(UNFAV) AUG. UPD VS. APR. UPD.	2001 PLAN	FAV/(UNFAV) PLAN VS. AUG. UPD.
	50	20	30	53	(33)
PPD R&D SERVICES PURCH					
SPD Services Purchased	235	235	---	---	235
	235	235	---	---	235
CLINICAL GRANTS					
CLINICAL GRANTS	3,000	2,800	200	1,065	1,735
	3,000	2,800	200	1,065	1,735
	14,357	13,661	696	~~9,187~~	4,474

SPD 120

9,307

Exhibit U,
Filed Under Seal

EXHIBIT V

MUNGER, TOLLES & OLSON LLP

355 SOUTH GRAND AVENUE

THIRTY-FIFTH FLOOR

LOS ANGELES, CALIFORNIA 90071-1560

TELEPHONE (213) 683-9100

FACSIMILE (213) 687-3702

560 MISSION STREET

SAN FRANCISCO, CALIFORNIA 94105-2907

TELEPHONE (415) 512-4000

FACSIMILE (415) 512-4077

April 13, 2007

WRITER'S DIRECT LINE
(213) 683-9127
(213) 683-5127 FAX
Jeffrey.Weinberger@mto.com

VIA E-MAIL AND US MAIL

Brian A. Davis
Choate, Hall & Stewart LLP
Two International Place
Boston, Massachusetts 02110

Re: ***Hancock v. Abbott Laboratories, No. 05-11150-DPW***

Dear Brian

This is in response to your letter of April 10, 2007 regarding the parties' respective Rule 30(b)(6) deposition notices.

Hancock's Rule 30(b)6 Notice

On topics 1 and 2, Hancock has already deposed, or is scheduled to depose, the individuals most knowledgeable regarding these topics. As you know, the key individuals who were in charge of both of these programs are former employees. As you recognized in your letter, we do not have the obligation to "seek out and collect information from former personnel" in preparing a Rule 30(b)(6) witness. Any witness that Abbott would now produce on these topics would be required to read this deposition testimony and, to the extent he/she could remember it, repeat it to you. This is a colossal waste of time and resources, and we do not propose to engage in it. However, as I indicated in my April 9 letter, we are willing to designate deposition testimony on these subjects as to which Abbott would agree to be bound in the same manner as if a 30(b)(6) witness was produced.

Your letter refers to inconsistencies or other problems with the testimony to date regarding these subjects. If you could be more specific, and identify any particular information that you believe you do not have and which could be provided by a Rule 30(b)6 witness, we will reevaluate our position.

On topic no. 3, Abbott intends to designate Stanley Bukofzer. Since Dr. Bukofzer is already scheduled to be deposed on April 25 on the same subjects, we expect that you can combine his individual deposition with the deposition under Rule 30(b)(6).

Abbott designates Dr. John Leonard as its Rule 30(b)(6) representative concerning topics 22 through 23. As you know, Dr. Leonard's deposition has been postponed to a date in May at your request in return for your agreeing to postpone the Blewitt and Klotz depositions. We expect to give you dates for Dr. Leonard after you provide us with dates for Messrs. Blewitt and Klotz. We are looking into the issue of the appropriate witness for topic 24.

Abbott's 30(b)6 Notice

Please provide dates for the Rule 30(b)(6) witnesses you agreed to produce as well as the identity of those witnesses. With respect to topics 5 through 8 of Abbott's notice, we do not need a separate Rule 30(b)(6) deposition for Mr. Friedman because we will be taking his deposition in May anyway. However, please do not interpret this statement as acquiescing to the admission of any expert opinions which were not timely disclosed in accordance with the Federal Rules, as we will vigorously oppose any attempt to do so. Simply stated, regardless of whom you designate, it is our position that neither Mr. Friedman nor any other expert may offer testimony at trial on these subjects because it was not disclosed in expert reports. Of course any "fact" testimony that Mr. Friedman would try to offer would clearly be hearsay.

In connection with requests 10 through 21, to the extent they pertain to Hancock's Committee of Finance, we are entitled to a clear statement from you that Hancock has no present information about the bases or criteria for the Committee of Finance's approval of investments in 2001 or, in the alternative, to a witness who can tell us what this knowledge is.

Finally, with respect to Abbott's topics 22 through 23, we will reserve our rights and wait until your Rule 30(b)(6) witnesses have testified to determine whether to pursue this further. I will note, however, that you are refusing to produce these witnesses on the same basis as stated in our objections to your requests 13 through 21.

Sincerely,

Jeffrey I. Weinberger

JIW:ncm
2738421.1

bcc: Peter N. Witty
Greg S. Phillips
Eric J. Lorenzini
Ozge Guzelsu
Kathryn Herrity
Sonia Arteaga

EXHIBIT W

CHOATE

CHOATE HALL & STEWART LLP

April 18, 2007

Joseph H. Zwicker
(617) 248-5065
jzwicker@choate.com

BY ELECTRONIC AND OVERNIGHT MAIL

Jeffrey I. Weinberger, Esquire
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071

Re: John Hancock Life Insurance Company, *et al.*
v. Abbott Laboratories
U.S.D.C. (Mass.) Civil Action No. 05-11150-DPW

Dear Jeff:

I am responding to your letter of April 13, 2007 to Brian Davis which we received after the close of business on Friday. Brian is out of the office this week. I understand that we are attempting to schedule a call later today that may resolve some outstanding scheduling issues.

Hancock's Rule 30(b)(b) Notice

Jeff, we are entitled to Abbott's knowledge regarding topics 1 and 2. Thus far, the testimony from the individual deponents on these subjects may fairly be characterized as incomplete. Persons from whom we would have expected to obtain relevant testimony, such as Bruce McCarthy, Chris Silber, and Phil Deemer, regularly claimed a lack of recollection of key events that were codified in documents they authored. Perhaps John Leonard is the appropriate choice for these topics. I'll leave that decision to Abbott.

We're amenable to combining Bukofzer's individual and 30(b)(6) testimony assuming we're not going to be limited to the 7 hours for both events. Unfortunately, for several reasons (including that I've just been notified that I have to argue a preliminary injuction motion in Springfield, MA on April 25), the April 25 date needs to be moved back a few days. We can discuss that later.

We're working on dates for Blewitt, Klotz, and Friedman and will attempt to schedule them as you requested for May 8-10.

Abbott's 30(b)(6) Notice

For topics 10-21, we plan to designate Willma Davis regarding issues related to the Bond Investment Committee. We propose Ms. Davis' deposition here in Boston on the morning of April 24, 2007. Ms. Davis has some half days available that week but I would not expect that her deposition would take more than a morning. I am continuing to work with Hancock to discover whether there is information relating to the activities of the Finance Committee as set forth in your Notice.

Other Depositions

Brian will shortly propose dates for Leonard and Tucker. Can you give me dates for Rodda's during the weeks of May 14 and 21st?

Thanks for your cooperation.

Very truly yours,

Joseph H. Zwicker

cc: Gregory D. Phillips, Esq. (by electronic and regular mail)
Peter E. Gelhaar, Esq. (by regular mail)
Michael S. D'Orsi, Esq. (by regular mail)
Brian A. Davis, Esq.

4143192.2